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January 21, 2015

Via ECF

Hon. Michael A. Hammer, U.S. Magistrate Judge
United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *Garry Kirkland v. Saveology*
Civil Action No. 2:13-cv-06602-ES-MAH

Dear Judge Hammer:

We represent Defendant Saveology.com, LLC ("Saveology") in the above-referenced matter. We write jointly with *pro se* Plaintiff Garry Kirkland to request an extension of time for fact discovery and depositions, which are currently set to end on January 28, 2015. (Doc. No. 17.) We respectfully request that the Court extend the time for fact discovery and depositions thirty (30) days to February 27, 2015. This short extension will not affect any other deadlines set forth in the Court's July 29, 2014 Pretrial Scheduling Order. (See Doc. No. 17.)

This is the first request for an extension by either party in this matter. The reason for this request is that it is taking longer than originally anticipated to gather documents (in particular, electronically-stored documents such as e-mails) that may be responsive to Mr. Kirkland's discovery requests. In addition, both parties would prefer to wait to hold Mr. Kirkland's deposition until after Defendant has produced documents responsive to these requests.

I spoke with Mr. Kirkland yesterday, and he consents to and joins in this request for an extension of the fact discovery and deposition deadlines to February 27, 2015. We thank the Court in advance for its consideration of this request.

Respectfully submitted,

s/ Gregory J. Couillou

cc: Garry Kirkland, *pro se* Plaintiff (via E-Mail and FedEx Overnight Delivery)

SO ORDERED

s/Michael A. Hammer

Michael A. Hammer, U.S.M.J.

Date:

1/26/15